

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN FEDERATED TITLE CORPORATION,
a Florida corporation,

Plaintiff,

- against -

GFI MANAGEMENT SERVICES, INC. a New York
corporation, ALLEN I. GROSS, an individual, and
EDITH GROSS, an individual,

Defendants.

Case No.13 Civ 06437(AJN)

**DECLARATION OF JOSEPH
ZELMANOVITZ IN
SUPPORT OF
DEFENDANTS' MOTION
TO DISMISS COUNT I OF
THE COMPLAINT**

JOSEPH ZELMANOVITZ declares pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a member of the firm Stahl & Zelmanovitz, attorneys for defendants GFI Management Services, Inc., Allen I. Gross, and Edith Gross ("defendants"). I submit this declaration in support of defendants' motion to dismiss Count I of the complaint.

2. A true copy of plaintiff's complaint, dated September 4, 2013, is attached to this declaration as Exhibit A.

Dated: New York, New York
November 25, 2013

STAHL & ZELMANOVITZ
Attorneys for Defendants
GFI Management Services, Inc.,
Allen I. Gross, and Edith Gross

By: /s/ Joseph Zelmanovitz
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